

IV. REMARKS

Status of the Claims

Claims 1, 12, 13-17, and 18 are amended. Claims 1-22 remain under consideration. Claim 16 is cancelled without prejudice.

Summary of the Office Action

Claims 1-4, and 6-22 stand rejected under 35USC102(b) on the basis of the cited reference Horii et al, U.S. Patent No. 5,882,220. Claims 1-5, 8-10, and 12-15 are rejected under 35USC102(e). The Examiner is respectfully requested to reconsider his rejection in view of the following remarks.

Discussion of the Cited References

US 5,882,220 (Horii et al.) discloses an electronic processing system with an electronic device 12 having an accessory connector 108 and a support element 14 which is arranged to support the accessory 10 connected to the accessory connector. The support element 14 also comprises two connectors: the first relay connector 50 and the second relay connector 54. A printed circuit board 52 connects the first relay connector 50 and the second relay connector 54 to each other. The accessory connector 108 is connected to the second relay connector 54, whereas the accessory's 10 connector is connected to the first relay connector 50. Therefore, it is clear that the accessory is not connected directly to the accessory connector of an electronic device.

At column 5, lines 3-8 the connection of the electronic device to the expansion module is as follows:

"In connecting the personal computer 10 to the expansion apparatus 12, the computer 10 is first connected to the

expansion adapter 14, and the adapter 14 is then connected to the expansion apparatus 12. In this manner, the personal computer 10 can be connected to the expansion apparatus 12 by means of the expansion adapter 14."

It is therefore clearly stated that the personal computer is not directly connected to the expansion apparatus.

US 6,108,200 (Fullerton) discloses a handheld computer keyboard system featuring a keyboard, a cover and an I/O connector to allow small computerized apparatus to be connected to the keyboard. It is clear that, in this system, the accessory, namely, the computer keyboard, supports the electronic device, namely, the computerized apparatus and not the reverse as in the subject application. There is no use for the keyboard not connected to the computerized apparatus, but, on the contrary, the computerized apparatus can be used without the computer keyboard system. Therefore, the invention, as defined in the independent claims under consideration is not known or taught by Fullerton.

This is supported by the text of the reference Fullerton at column 2, lines 16-22:

"This present invention is a handheld computer keyboard system for use in conjunction with small computerized apparatuses that typically do not have permanently attached keyboards. In one embodiment the system consists of a keyboard hinged to a cover and an interface assembly including an I/O connector configured to engage an I/O port of a computerized apparatus.

Further, the cover 12 is not arranged detachably in the keyboard but it is attached to the actual accessory part by hinges. Fullerton does not give a slightest hint to arrange the support

element 12 detachably in the actual accessory part as required in claims 13 and 18 of the subject application.

US 6,127,802 (Lloyd et al.) discloses a battery charger with battery retention door. The connector 113 is not an accessory connector but mating contacts for the purpose of recharging the battery of an electronic device. As disclosed in the specification of the current application (see paragraph 20) there are also other connectors (beside the accessory connector), such as a recharging connector, in the electronic device. Accessories like MP3 players, hands-free devices etc. diversify the usability of an electronic device.

Lloyd et al. teaches only a receptacle for holding the battery while it is being recharged. The battery does not constitute an accessory as contemplated in this application.

This is described in the abstract of the reference Lloyd according to the following:

"This invention is a battery charger having a pocket for charging a battery. The pocket is covered by a door which has a battery retention latch. When the door is open, and a battery is inserted into the pocket, the battery retention latch of the door exerts force upon the battery in a direction towards the charging contacts located in the base of the pocket."

The Issue of Anticipation

It is well settled that a claim is anticipated, "only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." (See CHISOLM, Federal Circuit Guide, Pg. 1221).

"...it must be shown that the reference contains all of the elements of the claims apart from irrelevant or merely extraneous variations, and the elements are arranged in the same way to achieve the same result which is asserted to be an inventive function..." 454 U.S. 1129 (1981)

The elements of the claim and their function and purpose within the claim must be reviewed in a manner similar to an infringement analysis. If the device described in the cited reference would not infringe if it was later, it will not anticipate if the reference is earlier.

Applying this standard to the various devices of the cited references, it becomes clear that such devices are missing significant elements of independent claims 1, 12, 13, and 18. There is no provision in the systems of cited references for providing a support on an electronic device for supporting an accessory that is directly connected to the electronic device.

Since this support forms no part of the systems cited by the Examiner, there would be no infringement if the references were later, therefore, the cited references do not support the rejection by the Examiner based on anticipation.

The above arguments are equally applicable to the rejected dependent claims.

In view of the remarks stated above, Applicant submits that all of the claims under consideration contain patentable subject matter and favorable action by the Examiner is respectfully requested. Should any unresolved issues remain, the Examiner is

invited to call Applicants' attorney at the telephone number indicated below.

A check in the amount of \$110 is enclosed for a one month extension of time. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



Geza C. Ziegler, Jr.
Reg. No. 44,004

15 JANUARY 2004
Date

Perman & Green, LLP
425 Post Road
Fairfield, CT 06824
(203) 259-1800
Customer No.: 2512

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service on the date indicated below as first class mail in an envelope addressed to the Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date: 1/15/04

Signature: Carolina Rodriguez
Person Making Deposit